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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Gilberto Quiroz,

Plaintiff,

v.

United States of America,

Defendants.

CASE NO. : 2:24-cv-00706-RFB-MDC

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(THIRD REQUEST)**

Pursuant to LR IA 6-1 and LR 26-3, the parties request a 45-day extension of certain discovery deadlines as, and for the reasons, set forth below. There is a good cause for such extension as the parties continue to conduct discovery diligently and in good faith. However, unforeseen circumstances that are out of the parties' control necessitate the request for this extension. This request is made fewer than 21 days before the next discovery deadline for rebuttal expert disclosures, which is currently August 8, 2025. Good cause exists to extend the current deadlines. Plaintiff's experts require additional time to prepare the rebuttal reports. Additionally, the parties are working together to get all necessary depositions scheduled. This is the third request for an extension of the discovery schedule.

DISCOVERY COMPLETED

The parties have completed the following disclosures and discovery:

The parties served their respective initial disclosures.

Plaintiff executed HIPPA authorizations for his medical records on February 27, 2025. Defendant sent out corresponding subpoenas to medical providers.

Defendant sent discovery requests on March 10, 2025, which Plaintiff answered in full on April 23, 2025.

Defendant noticed Plaintiff's deposition for August 18, 2025.

The parties served their respective expert disclosures.

Plaintiff provided dates of availability for their expert, Dr. Thomas Dunn's deposition, as well as Plaintiff's treating provider, Dr. Kenny Hann's deposition.

Plaintiff requested dates of availability for the Defendant driver's deposition.

DISCOVERY REMAINING

The parties need to disclose rebuttal expert reports and take the depositions of treating providers, experts, the Defendant driver, and Plaintiff. The parties will continue to supplement their respective disclosure statements as needed. Plaintiff will send written discovery requests to Defendant.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

It took some time for the subpoenaed medical records to be complete. The parties agree that good cause exists to continue the discovery deadlines by 45 days to allow time for the rebuttal disclosures and all necessary depositions to go forward. The parties are working well together to ensure that discovery keeps moving forward.

EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER

The following table sets forth the current deadlines and the proposed extended deadlines that are the subject of this stipulated request:

Scheduled Event	Current Deadline	Proposed Deadline
Rebuttal Expert Disclosures	August 8, 2025	September 22, 2025
Discovery Cut-Off	October 9, 2025	November 24, 2025
Dispositive Motions	November 10, 2025	December 26, 2025
Proposed Joint Pretrial Order	December 10, 2025	January 26, 2026



1 Good cause exists to continue the deadlines by 45- days as set forth above as it will allow
2 the parties the time to complete rebuttal expert reports, depositions, and any additional document
3 requests or written discovery that may be needed. This request for an extension of time is not
4 sought for any improper purpose including delay.

5
6 DATED this 6th day of August, 2025.

7 LADAH LAW FIRM

8 /s/ Ramzy P. Ladah
9

10 **RAMZY P. LADAH, ESQ.**

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16 *Attorneys for Plaintiff*

DATED this 6th day of August, 2025.

SIGAL CHATTAH

United States Attorney

/s/ Virginia T. Tomova

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Attorney for Defendant

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 8-7-25

LADAH LAW
FIRM

